

# **USDA Child Nutrition Programs Administrative Review Summary Report**

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**School Food Authority:** Oostburg School District  
**School(s) Reviewed:** Oostburg Elementary (Grades K-5)  
**Date of Exit Conference:** 1/12/17

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**Agency Code:** 59-4137  
**Review Date(s):** 1/11-12/2017

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews (AR) are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

## **General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage [dpi.wi.gov/school-nutrition/training](http://dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage [dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

## **Appreciation/Commendations/Noteworthy Initiatives:**

Special thanks is extended to the following staff positions at the Oostburg School District: Food Service Manager and Elementary School Food Service Staff, Elementary School Secretaries, and the Business Manager for the courtesies extended to us during the on-site review. We were especially appreciative of all the time spent answering questions off site and pulling records/documentation needed for the on-site review. Staff were very receptive to recommendations and guidance. The Food Service Manager did a very thorough job of answering the many questions on the *USDA Off-Site Assessment Tool*, and the answers were easily validated during the on-site review.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Commendations

- Good documentation of contacts made with the household when reviewing free and reduced price meal applications, especially when questions arose, and also for keeping a copy of the eligibility notification letter sent to the family.
- Good efforts to follow up with households reporting *annual income* to see if the income meets the criteria of seasonal or fluctuating and would qualify to be reported annually. Only those households with fluctuating income, e.g. seasonal workers or self-employed should report annual income. All others persons report *current income*, i.e. weekly, bi-weekly, monthly, etc. Also, nice to see notes made on the applications when it was necessary to clarify income or other information on the application.
- Meal applications (electronic and paper) were approved in a timely manner. Direct certification has been completed to meet the required time frames, i.e. on or before the start of the school year, three month, and six month timeframe.
- Good job to notify households that had not reapplied for meal benefits (or been directly certified) that the household benefits would be expiring.

#### Comments/Technical Assistance/Compliance Reminders

##### **Certification and Benefit Issuance**

- Since this is the first year that the district utilized the *online application* please be sure that the application information is backed up to meet the USDA record retention requirements of three years plus the current year of operation, or longer if under audit. This also applies to the *State* direct certification files.
- Applications with a case number should be accepted at *face value* provided the case number contains the required number of digits (10). Per the USDA *Eligibility Manual for School Meals* – EM, (School Year 2016-17), <http://dpi.wi.gov/sites/default/files/imce/schoolnutrition/pdf/eligibility-manual-2016.pdf>, schools are encouraged to review the direct certification list to determine whether any of the applications with case numbers can be matched with children on the list. If no match is found, the LEA (Local Educational Agency) should contact the household for further clarification. If the LEA still consider the application to be questionable, the determining official should *verify the application for cause*. This is an appropriate time when the LEA can reach out to the local social service agency to confirm Food Share or W-2 Cash Benefits. Remember, verification for cause can be completed anytime during the school year.
- Reminder: Any students that were *denied* benefits must be notified in writing, email or mail is fine. Be sure to keep copies of the household notification.

#### Findings and Corrective Action Needed

**Finding:** There was only one meal application error found per the review of the meal applications selected for the statistical sample. The error is summarized on the SFA-1 review form. Copy attached. The application was coded RAVA, RAAL, and RAJO. Based on the notes on the application it is very likely the household reported net versus gross income as required.

**Corrective Action Needed:** For corrective action please send a letter to the household detailing the error and asking for a clarification of income. Reevaluate the income and as needed change the eligibility status. If there is a reduction in benefits, be sure to extend appeal rights for the required timeframe (10 calendar days), and note who to contact if an appeal is going to be made. Submit a copy of the letter to DPI and a screen shot from the software to show that the change in benefits occurred.

Fiscal action is determined for all *critical review* areas which pertains to certification AND benefit issuance errors. USDA has established a \$600 forgiveness before fiscal action is assessed. The results of the fiscal action will be indicated in the review closure report.

## **Verification**

### **Comments/Technical Assistance/Compliance Reminders**

The following recommendations are made as a result of the review of the verification process:

- Recommend the Verifying Official (VO) use what is called the *Tracker* form for each application selected for verification. This will document the process from start to finish and assist the VO in reporting the results of verification on the Verification Collection Report (VCR).
- Be sure to retain ALL documentation submitted for verification including the selection for verification letter and the results of verification letter. Software letter templates were used, but district may want to consider use of the new DPI “family friendly” letter templates.

### **Findings and Corrective Action Needed**

**Finding 1:** Income information submitted by the household selected for verification was evaluated based on “net” versus “gross” income. At that time benefits were changed only from free to reduced price meals. Income to be reported on the application is *gross income*. This should have resulted in a change from free to paid meals, not free to reduced price meals.

**Finding 2:** When the letter of adverse action was sent to the household the required 10-calendar day appeal rights were not extended to the household. The benefits were immediately changed.

**Finding 3:** The required **confirmation review** was not completed prior to sending out the letter of selection for verification.

**Corrective Action Needed:**

#1 and #2: Send a letter to the household explaining the error, extend appeal rights, if no appeal is made change the eligibility status to paid. Submit a copy of the letter, and a screen shot from the software to show that the change in benefits occurred as corrective action. Also submit a statement of your understanding of the appeal rights requirement.

#3: The confirming official per the online contract is the Business Manager. The purpose of the confirmation review is to ensure that the initial eligibility determination was correct prior to proceeding with verification. Refer to page 85 of the SY 2016-17 EM for specifics on the confirmation review. Please write your understanding of the confirmation review/process and intent to comply at the time verification is completed next school year.

## **Meal Counting and Claiming**

### **Commendations**

Review of the software meal count reports, edit check for each school, and enrollment/attendance information for the review period - December 2016 found no errors. Great job!

## **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

### **Commendations**

Sincere thanks to the Food Service Manager and school nutrition professionals of Oostburg Elementary School. We appreciate your time and efforts spent preparing for and participating in the on-site review. The kitchen is clean and staff consistently follow food safety best practices. Customer service was excellent. Staff were very welcoming. Best of luck with the upcoming renovation!

### **Technical Assistance and Program Requirement Reminders**

#### **Minimum Daily Requirements**

Students must be offered 3/4 cup vegetables to meet minimum daily requirements. The planned menu on Monday, December 12, includes a whole grain-rich burrito with salsa for 6 through 12 grade students only. The Oostburg Elementary School production record does not list the burrito, but it does list the salsa as a 1/4 cup serving of vegetable. Nothing is recorded in the row, indicating salsa was not served that day. This results in a 1/4 cup shortage in the vegetable component on that day.

#### **Production Records**

The production record template currently in use is missing required information. While there is no required template, there are examples on our website: <http://dpi.wi.gov/school-nutrition/nationalschool-lunch-program/menu-planning/production-records>. Current templates must be updated to include planned number of portions for continued use. Additionally, the columns "Amt Sent" and "Amt Left" are not consistently written as portions or purchase units. Please alter these columns so the following required information can be distinguished:

- Total number of purchase units prepared
- Total number of portions prepared and number of portions left over

All sections of the production record must be filled in completely each day. Actual number of reimbursable and non-reimbursable (adult) meals was frequently left blank. Daily production records show portion sizes of meal components were appropriately planned and served. Please continue to work with all staff members to record planned usage, actual usage, and leftovers.

Planned portion sizes were inconsistent with actual portion sizes served for lunch on the day of review. Production records noted planned portion sizes of 1/4 cups of carrots and 1/4 cup of fresh fruit. However, actual serving sizes were 1/2 cup of carrots and 1/8 cup of kiwi. When actual serving sizes are inconsistent with planned portion sizes, production records do not accurately represent the meal pattern offered to students. Please ensure that planned portion sizes are consistent with actual portion sizes or that production records are updated to deviations.

### **Portion Control**

Overall, staff did a fine job helping the students select reimbursable meals. They often encouraged selection of fruits and vegetables. Remember, portion sizes should be consistent. Inconsistent portion sizes may lead to decreases in customer satisfaction, as those who receive smaller portions feel less valued. Furthermore, inconsistent portioning makes it more difficult for students to learn good eating habits and for staff to identify full components and reimbursable meals.

### **Substitutions**

Any changes to the planned menu must be properly documented on the production record. Substitutions should be foods that credit comparably to the original planned item, have a similar nutrition profile, and belong to the same vegetable subgroup (when applicable) to the extent practicable. However, it is always better to substitute something creditable, rather than to have a missing component. **Dietary Specifications**

The updated meal pattern mandated by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 outlined a sodium restriction using three targets to allow for a gradual implementation. The first target was implemented July 1, 2014, and the second target will be implemented July 1, 2017. Products that can be major contributors of sodium include condiments, regular canned vegetables, deli meats, dairy products, olives, and processed food items. Butter Buds contains 75 milligrams of sodium per teaspoon. The use of these products should be closely monitored and limited to meet sodium requirements in this school year and upcoming school years.

### **Training**

We recommended anyone involved with the school meals program attend DPI training classes. The classes are offered throughout the summer and selected other times during the year. Classes are provided free of charge. Numerous webcasts are also available online. Travel and/or meal expenses are allowable food service expenses for your program. Classes provide an overview of all areas of the USDA requirements for the federal nutrition programs including verification, free/reduced applications, civil rights, USDA Foods, menu planning, production records, and record keeping requirements. Information on summer classes will be sent to School Food Authorities in late spring and is also available on the DPI website at <http://dpi.wi.gov/school-nutrition/training>.

### **Findings and Corrective Action Needed**

**Finding:** Minimum daily requirements for vegetables were not met on Monday during the week of review.

**Corrective Action Needed:** Please submit a statement describing how you will meet the minimum daily requirements when mini corn dogs and whole grain-rich burritos are on the menu together in the future.

**Finding:** Production records are not filled in completely.

**Corrective Action Needed:** Please submit production records for two days with all sections filled in completely

### 3. RESOURCE MANAGEMENT

#### Comments/Technical Assistance/Compliance Reminders

- REMINDER: SFAs are required to have a *local meal charge policy* in place no later than July 1, 2017. More information, resources and best practices may be found on the School Nutrition Team <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>, scroll down to the unpaid meal charges section. For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf> ○ Best Practices ○ Local meal charge policy checklist ○ Sample outstanding balance letter ○ Sample robo-call script

The district has a minimal unpaid meal charge policy. Please compare your policy to the policy requirements outlined in the above Unpaid Meal Charge Guidance and the USDA memo - SP-58. As needed, revise and submit for school board approval prior to July 1, 2017. In terms of the section on REFUNDS, note that the policy requires refunds to students that receive *Reduced Price* meal benefits when the student withdraws or leaves the district. Refer to page 32 of the Unpaid Meal Charge Guidance above.

USDA has established four areas for compliance in the *Resource Management* area. A series of questions related to: Maintenance of the Nonprofit School Food Service Account, Paid Lunch Equity (PLE), Revenue from Nonprogram Foods, and Indirect Costs was sent to the SFA at least 4 weeks prior to the AR. Based on the answers the school triggered what is called a *Comprehensive Review*. For the district a comprehensive review was conducted only in the *Revenue from Nonprogram Foods* area.

NOTE: During the onsite Resource Management portion of the review the *Paid Lunch Equity* tool/requirement and district options in lieu of future required paid student meal price increases were discussed as they related to keeping the food service program fund balance within the allowable limits (i.e. 3 months' average expenses). Please feel free to contact DPI if you need assistance running the 2017-18 PLE tool or would like to discuss the PLE Exemption Request/process.

#### **Revenue from Nonprogram Foods**

## **Comments/Technical Assistance/Compliance Reminders**

Our thanks to the Food Service Manager and Business Manager for answering a series of questions off site and onsite and for completing the required *Nonprogram Foods Revenue* tool.

The Healthy Hunger Free Kids Act of 2010 established requirements regarding revenue from the sale of nonprogram (NP) foods (formerly referred to as *ala carte*). All revenue from the sale of NP foods must accrue to the nonprofit food service account, and revenue available to support the production of reimbursable school meals does not subsidize the sale of nonprogram foods.

Nonprogram foods include any nonreimbursable foods and beverages purchased using funds from the nonprofit school food service account, such as adult meals, food sold outside of school hours, or any food used for catering or vending activities. For the Oostburg School District nonprogram foods/beverages include: adult meals, second entrees and occasionally a few sides sold at the HS/MS, and extra milk sales.

Compliance for all nonprogram food/beverages is determined if the percent of total revenue generated from nonprogram food sales is equal to or greater than the percent of total food costs for nonprogram foods. USDA allows schools to use a simplified approach to determine compliance, by selecting a reference period (5 consecutive days). SFAs will separate nonprogram food costs from their program food costs for the 5 day reference period. DPI has created a tool to assist schools in meeting this requirement, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-pricecalculator.xlsx>. The DPI tool can also assist SFAs in pricing nonprogram foods and calculating total nonprogram food expenses and revenues and total program expenses and revenues for the designated reference period. This data then pulls into the USDA *Nonprogram Food Revenue Tool* comparing revenue and food cost ratios to measure compliance. The tool has been completed to show that costs for nonprogram foods are being covered.

Most adults and non-program persons pay for their meals at the established price which is consistent with the Adult Meal Pricing Guide, <http://dpi.wi.gov/sites/default/files/imce/schoolnutrition/doc/wisconsin-adult-meal-pricing-guide.doc>. General fund transfers/journal entries were also provided and showed the district was covering the cost of these meals.

Be reminded that the **revenue and expense** for all nonreimbursable adult meals will be reported on the *NEW* Food Service Program financial report (referred to above under Nonprofit School Food Service Account) as a nonprogram food and revenue. Schools no longer report the number of nonreimbursable meals on the monthly reimbursement claim.

## **Findings and Corrective Action Needed**

**Finding #1:** The district shows a category called *Complimentary* on its *Purchasable Item Detail Report*. These are meals served to food service employees and meals served to volunteers-*Lunch Buddies*. The Lunch Buddy meals are not allowable costs to the food service program.



**Corrective Action Needed:** Food service program staff meals do not require district funds to cover the cost of the meals since these meals are served to staff that are charged as an expense directly to the food service program. Note also, these meals do not need to be included as an expense on the food service program annual financial report **and** there is no need to enter these meals on the nonprogram food revenue tool. For the additional meals, categories (or coding) should be set up in the accounting system to separate meals served to the food service staff and the complimentary-*Lunch Buddy* meals. At the end of the year, the district will only need to transfer funds from the General Fund or other non-Federal account if the nonprogram food revenue ratio shows that expenses are greater than total revenue in nonprogram foods. NOTE: It is still is a recommended *best practice* for agencies to budget for a transfer when free meals are provided to nonprogram persons.

**For corrective action indicate your plan to comply with this program requirement.** Don't forget to also include the cost of all nonreimbursable meals as a food expense on the food service financial report at the end of the fiscal year regardless of category.

**Finding #2:** Per district policy when a family account is in arrears or in the negative the household may be prohibited from charging additional meals to their account. The meal alternative provided is a peanut butter/jelly sandwich and a carton of milk at no charge.

**Corrective Action Needed:** The PBJ and milk are considered nonprogram foods (these are not reimbursable) and in effect require revenue to cover the cost of the meal. Please track these meals in your software system (add a category), and add the category to the district's Nonprogram Foods Revenue tool to determine if the cost of the meals is covered. Similar to the Lunch Buddy meals, a transfer must be made at the end of the year to cover the cost of these nonprogram foods if it is determined that **total nonprogram food expenses** are greater than total **nonprogram foods revenue**. Provide the updated tool for a new reference period and a statement to indicate the plan to cover the cost of these meals. NOTE: All schools will need to address *negative accounts* in the district *Unpaid Meal Balance* policy.

#### **4. GENERAL PROGRAM COMPLIANCE**

##### **Civil Rights**

##### **Comments/Technical Assistance/Compliance Reminders:**

##### **Nondiscrimination Statement**

When including the non-discrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was just updated in October 2015 <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civilrights>. However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, "**This institution is an equal opportunity provider,**" so that it can be printed in the same size font as the other printing in the document.

##### **Special Dietary Needs**



The district is in the process of completing a review of all school board approved policies. **Policy 8500-Food Services** contained some language regarding meals/substitutions provided for students with disabilities. Some of the language is not consistent with recent changes in the Americans with Disabilities Act (ADA) and how it affects the school nutrition programs.

Until recently regulations only *required* schools to make meal accommodations if a licensed medical professional provided documentation to establish that the student has a *disability*. Recent passage of the ADA Amendments Act, considers most physical and mental impairments to constitute a disability. So rather than focus on whether or not the student has a disability, schools should now focus on ensuring equal opportunity to participate in the meal programs. Refer to this USDA policy memo, <http://www.fns.usda.gov/policy-memorandum-modifications-accommodate-disabilities-school-meal-programs>.

If accommodations are made without out medical statement, the student must be offered all meal pattern components and select at least three (this includes selection of at least ½ cup fruit or vegetable) per your offer versus serve policy.

DPI will be updating the *Dietary Request* form soon to meet modified requirements regarding accommodations for students with special dietary needs, <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/medical-statement.pdf>. Please replace the form that is currently posted to your website with this new statement.

Since medical authorities no longer need to check a box to indicate if the child's medical condition is a "disability." The medical statement will still require the medical authority to indicate the following: types of foods to be avoided, a list of foods to be substituted; and require a description of the modifications needed to accommodate the child's needs. If the form is completed by a medical authority the school will be required to meet the student's dietary needs/meal accommodations. It is recommended that the district compare your policy to the USDA guidance and update the language in the policy referenced above to be consistent with these changes.

### **Findings and Corrective Action Needed**

**Finding:** *Public release* outreach for the NSLP was not completed as intended. SFA incorrectly posted the public release on the district website and printed in the district newsletter. The public release contains both the free and reduced price meal guidelines and these should not be provided directly to enrolled households via district communications, i.e. newsletter or website. As discussed with the Food Service Manager and DPI consultants, possible media and grassroots organizations in the area include: *Lakeshore Weekly*, food pantries at local churches and the public library.

**Corrective Action Needed:** Regulations require the public release be sent to the local news media, unemployment offices, and any major employers contemplating layoffs in the attendance area of the school. In addition, some form of community or grassroots outreach regarding availability of free/reduced price meals at the district must be completed. For corrective action, submit a statements on your public release procedure for the future. Please maintain documentation of whom the release was sent to along with the specific materials distributed.

## On-site Monitoring

Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the **readily observable general areas** of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA by February 1.

The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form can be found on our website at:

<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-onsite-monitoring.doc>, and <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sbp-onsite-monitoring.doc> for the breakfast program.

For the SY 2016-17 the Food Service Manager completed the on-site reviews for each school using the updated form. Thank you. During the review we specifically discussed the scope of the “readily observable” or general areas on the monitoring form since these are new. Refer also to the information regarding the General areas of the Administrative Review posted to the website if further clarification is needed for evaluation in each of these areas, <http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/administrative-review>. (Scroll down to the area: General Program Compliance.)

## Local Wellness Policy Summary for Administrative Review

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and *full compliance with the requirements of the final rule by June 30, 2017*.

Language should be added to district wellness policies to permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.

### Content of the Wellness Policy

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other schoolbased activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for School Meal Nutrition Standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.

- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

A summary of the requirements can be found at:

[http://www.fns.usda.gov/sites/default/files/tn/LWPsummary\\_finalrule.pdf](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf). USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

DPI has created a Local Wellness Policy Checklist which was used to compare the district policy against the WP regulation/requirements. The checklist can be found at <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf>. A limited overview of the district's current WP was conducted and a copy of the recommendations for update of the WP left during the onsite AR. Please consider these recommendations for additional update of the district policy before July 1, 2017.

## **Smart Snacks in Schools**

### **Commendations**

No Smart Snacks are offered for sale at the reviewed school - elementary school. The food service manager did however provide a copy of the exemption for the annual candy cane fundraiser. Thank you.

### **Comments/Technical Assistance/Compliance Reminders:**

- **All foods or beverages** sold to students on the school campus between midnight and 30 minutes after the end of the instructional day must be in compliance with the Smart Snacks rule that went into effect on July 1, 2014. Information on this regulation, along with a product calculator to help determine compliance of various food items, can be found on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.
- Each student organization may hold two exempt fundraisers per school year. An exempt fundraiser can sell foods or beverages that do not meet the Smart Snacks guidelines. Each fundraiser cannot exceed two consecutive weeks in length, and it cannot occur in the meal service area during meal time. As necessary the school must complete the exempt fundraiser tracking tool annually and use it to ensure that each student organization does not hold more than two exempt fundraisers.

## **Professional Standards (PS)**

The Healthy Hunger-Free Kids Act of 2010 amended 7 CFR Parts 210 and 235 of the regulations to institute hiring standards for the selection of State and local school nutrition program directors and requires all personnel in the school nutrition programs to complete annual continuing education/training. These regulations are expected to result in consistent, national professional standards that strengthen the ability of school nutrition professionals and staff to perform their duties effectively and efficiently. These regulations took effect July 1, 2015.

### **Commendations**

The food service manager has done a good job to document training for the SY 2015-16 and SY 2016-17 for herself and all food service staff in the district. She has documented training efforts and has maintained a file of all training attended. She also continues to monitor that the staff are meeting the training requirements per their respective PS category.

### **Comments/Technical Assistance/Compliance Reminders**

Due to the scope of the food service program duties the following staff persons must also meet Professional Standards training requirements: Confirming Official (Business Manager), Elementary and Middle School cashier/staff, and the Elementary School secretary that is responsible for the Special Milk Program. Training for these staff falls into the category of *Non-school Nutrition Program Staff with Job Duties Pertaining to School Nutrition Programs*. The staff need to be obtain continuing education hours and the training completed should be documented on the tracking tool each school year. Refer to the DPI, Professional Standards Nutshell, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-in-a-nutshell.pdf>, and <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-trainingrequirements.pdf>.

In terms of available trainings, please refer to the training website, for webcasts, and upcoming DPI trainings, <http://dpi.wi.gov/school-nutrition/training>.

Reminder to the Food Service Manager to be sure to keep the Tracking Tool current for each school year. The SY 2016-17 is the end of the two-year cycle for Professional Standards for the majority of the food service staff. Next school year will be the start of a new 2-year cycle to obtain the required continuing education hours. Consider this year 1 for the non-food service program staff and the newly rehired/hired food service program staff that have not previously been documented.

## **Food Safety, Storage and Buy American**

### **Commendations**

To restate a previous comment, the kitchen and food storage areas at the high school (store room, refrigerator/freezer, and milk cooler) were well maintained and clean. The serving areas looked just as nice at the end of the meal service as they did at the start of the meal service.

## **Food Safety Inspections**

### **Comments/Technical Assistance/Compliance Reminders:**

Every school operating USDA School Child Nutrition Programs, must have two food safety inspections during each school year, one in the fall of the school year, which is an actual Food Safety Inspection, and one in the spring which is a review of the site's Food Safety Plan. Food safety inspection reports are required to be posted in public view. The food service manager was not aware that the most recent inspection report needed to be publicly posted. The inspection report was located on a door at back of the kitchen which is not a publicly accessible location. *During the review the poster was moved near the serving area close to the Justice for All poster.* Thank you.

The food safety (fs) plan was reviewed and appeared to be last updated in 2015. The fs plan should reviewed and that review at least documented annually. The food service manager should be sure to complete the *check boxes* as applicable on the Standard Operating Procedures in each school's fs plan, and she should complete the equipment inventory log. This comment has also been made on past food safety inspection reports.

## **Buy American**

### **Comments/Technical Assistance/Compliance Reminders:**

Regulations took effect with the start of the 2016-17 SY for the *Buy American provision*. This provision requires SFAs to purchase, to the maximum extent practicable, *domestic agricultural commodities or commercial food products*. "Domestic Commodity or Product" are defined as an agricultural commodity that is produced in the United States and a food product that is processed in the United States using substantial agricultural commodities that are produced in the United States. "Substantial" means that over 51 percent of the final processed product consists of agricultural commodities that were grown domestically. Products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowed under this provision as territories of the United States.

The Buy American provision (7 CFR Part 210.21(d)) is one of the procurement standards SFAs must comply with when purchasing commercial food products served in the school meals programs. The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

The AR requires the State Agency to assess compliance by checking 1-2 items in a variety of food categories.

### **The following items were found to be non-compliant:**

Canned – Mandarin Oranges and Tropical Fruit - China

### Recommendations for compliance:

Some products will not be grown domestically, such as pineapple and mandarin oranges. The food service manager should work with distributors to see if these products are available domestically. If they are not, document this on the Non-compliant Product List,

<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>.

Note: The use of this form is the exception, not the rule. I encourage the Food Service Manager to read what is posted about Buy American on the website,

<http://dpi.wi.gov/schoolnutrition/procurement/buy-american>. You might also read thru the USDA memo, SP24-2016, <http://www.fns.usda.gov/sites/default/files/cn/SP24-2016os.pdf>. If there are additional questions about Buy American the food service manager should ask them during the upcoming procurement review.

## **Summer Food Service Program Outreach (SFSP)**

### **Comments/Technical Assistance/Compliance Reminders**

□ A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at Oostburg School District USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](#) on the **DPI Summer Meals website** ○  
Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text ‘food’ to 877-877 to locate meals in the area
- Promotion of the USDA Summer Food website  
<http://www.fns.usda.gov/summerfoodrocks>

Near the end of this school year, it can be a simple paragraph in the district newsletter sent home to students, or putting up free posters and/or mail these items free of charge. For more information on the SFSP contact:

Amy J. Kolano, RD, CD

Summer Food Service Program Coordinator Phone:

608.266.7124

e-mail: [amy.kolano@dpi.wi.gov](mailto:amy.kolano@dpi.wi.gov)

## **5. OTHER FEDERAL PROGRAMS REVIEWS**

### **Special Milk Program (SMP)**

### **Comments/Technical Assistance/Compliance Reminders:**

- SFA can choose to operate any one of the three SMP pricing options: [nonpricing plan](#), [pricing plan](#) and [pricing plan with free milk option](#). The SFA currently offers the pricing plan with free milk option. Since issues were found with administering the program, opting for the pricing plan may help eliminate applications, reduce administrative work and streamline the point-of-service process. This may be a consideration for the SY 2017-18.
- The SFA charges families \$18 a year for milk; dividing 18 by 150 junior kindergarten school days' equals 12 cents per half-pint of milk. This price does not match the per half pint milk price of 5 cents on the districts approved online contract. To determine the cost per half-pint, divide the total dollar cost of all milk purchased for the SMP during the claiming month by the number of half-pints of milk purchased for the program. After factoring reimbursement and milk cost, the current charge of 12 cents per half-pint is quite high and the SFA should consider charging less for the milk next school year. The following calculation can be used to determine a recommended milk price:

$$\text{Example: } \frac{1}{2} \text{ pint cost } \$\_\_\_\_\_\_ + 2\text{¢} - \text{reimbursement } \$\_\_\_\_\_\_ = \$\_\_\_\_\_\_ \frac{1}{2} \text{ pint price} \times 150 \text{ days} = \$\_\_\_\_\_\_ \text{ annual charge}$$

### **Findings and Corrective Actions Needed:**

**Finding #1:** Two free milk certification errors were found when reviewing SMP free milk applications. These errors are summarized on the SFA-2 review form. The first error coded WAJU occurred due to the direct certification glitch in August which was missed during corrections. The second error coded GOEV was also a direct certification error because the school inadvertently mixed up the student with another family of the same last name.

**Corrective Action Needed:** As discussed, please send an adverse action letter explaining the application errors to both households allowing them 10 calendar days to respond.

**Finding #2:** Point-of-service (POS) counts for SMP must be recorded by “who” did take milk not by absentee records. These milk counting procedures have the potential to yield inaccurate milk counts with no actual daily milk counts records, and incorrect reimbursement claims.

**Corrective Action Needed:** Please submit a plan to correct the Point of Service (POS) and submit 30 consecutive days of corrected milk counts (February into March). Please advise DPI of the duration of this milk counting error, i.e. how far back the inaccurate POS system has been in place. A standard operating procedure (SOP) for the new POS must be developed and training provided to teachers on the new POS method. The Food Service Manager should periodically monitor the new process to ensure that all steps are correctly executed.

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Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in



life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students' success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage [dpi.wi.gov/statesupt/agenda-2017](http://dpi.wi.gov/statesupt/agenda-2017).

